

**U.S. Department of Justice**  
Civil Division

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May 9, 2025

**By ECF**

Honorable Michael E. Farbiarz  
United States District Judge  
U.S. Post Office & Courthouse  
Federal Square  
Newark, New Jersey 07101

Re: ***Khalil v. Joyce, et al.*, Civ. Act. No. 25-1963 (MEF) (MAH)**  
**Government's Request for an Extension of May 12 Deadline**

Dear Judge Farbiarz:

Respondents ("the Government") respectfully request an extension of its May 12 deadline to submit a supplemental brief. *See* ECF No. 228. The Government requests a forty-eight-hour extension and that the brief be due on May 14 at 11:59pm. The Government makes this request for several reasons, all which establish good cause. Undersigned counsel conferred with Petitioner's counsel, and Petitioner takes no position.

*First*, undersigned counsel has been sick and dealing with other health issues over the last few days. Those concerns have inhibited the undersigned's ability to work on the brief as required. As a result, additional time is required to draft the brief as well as account for the multiple layers of review that the filing will require. An extension will ensure that the Government has raised the necessary defenses and counterarguments to those raised in Petitioner's supplemental brief.

*Second*, the additional time is necessary to account for time spent dealing with other urgent deadlines and responding to the Court's orders this week. *See* ECF Nos. 231, 234, 242. Undersigned counsel anticipated having additional time even absent the health issues, but other urgent matters, including the Court's order requesting information, required more immediate attention. Undersigned counsel took necessary steps to address each urgent issue, including preparing for moots for short-fuse hearings, reviewing other briefs, and coordinating with various government agencies to obtain court-requested information. As a result, undersigned counsel now requires additional time to account for these instances.

The Government continues to work diligently on this case and does not seek this short extension to cause prejudice or delay the proceedings. Rather, the extension is necessary so that the Government can effectively defend this case.

We thank the Court for its consideration of this request.

Respectfully submitted,

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